

FILED

Clerk  
District Court

SEP 06 2005

For The Northern Mariana Islands

By \_\_\_\_\_  
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*Attorneys for Defendant World Corporation***IN THE UNITED STATES DISTRICT COURT****FOR THE****NORTHERN MARIANA ISLANDS****YU SUK CHUNG,**

Plaintiff,

vs.

**WORLD CORPORATION,**

Defendant.

CIVIL CASE NO. 04-00001**STIPULATION AND ORDER**

1 In furtherance of the Court's Order of June 16, 2005, and pursuant to Fed. R. Civ. P. 29  
2 and other applicable law, the parties stipulate as follows:

3 1. The Plaintiff will proceed with the deposition of Chairman Cho in Korea, and the  
4 parties waive objections to the admissibility and use of the Chairman's deposition in this case.  
5 The parties specifically reserve evidentiary objections to the questions asked during the  
6 deposition or the resulting testimony, objections regarding privilege, and objections regarding the  
7 scope and limits of discoverable material or information under the federal rules.

8 2. The parties understand and agree that the deposition of Chairman Cho shall take  
9 place at the law offices of Shin & Kim, Ace Tower, 4th Floor, 1-170, Soonhwa-dong, Chung-ku  
10 Seoul 100-712, Korea.

11 3. Defendant has used its best efforts to make the legal and logistical arrangements for  
12 the deposition to the extent possible. Although Defendant has offered to make hotel and travel  
13 arrangements for the Plaintiff's counsel pursuant to the Court's June 16, 2005 Order, Plaintiff's  
14 counsel has opted to make his own arrangements with the intent of seeking reimbursement from  
15 Defendant. Defendant reserves its right to contest reimbursement to the extent it deems  
16 appropriate.

17 4. In lieu of having the Chairman sworn by an officer qualified to administer oaths as  
18 would normally be the case for a deposition, the parties stipulate that the Chairman will testify  
19 under penalty of perjury under the laws of the United States of America for purposes of the  
20 deposition.

21 5. The deposition shall be recorded by audio and videotape means and the Plaintiff or  
22 his counsel shall provide such audiovisual equipment and media. At Defendant's request, the  
23 audio tape shall be released to the custody of the Defendant or Defendant's counsel for  
24 preparation of the transcript. A copy of the video tape will be provided to the Defendant no later  
25 than September 10, 2005. Defendant may also record the deposition at Defendant's option.

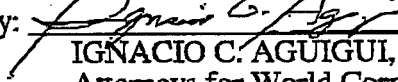
26 6. The deposition shall be scheduled as follows unless otherwise subsequently modified  
27 by agreement of the parties: On September 5, 2005, from 9:00 a.m. to 5:00 p.m. with one hour  
28

for a lunch break. On September 6, 2005, from 8:00 a.m. to 4:00 p.m. with one hour for a lunch break.

7. The Plaintiff desires to use the services of an individual designated by the Center for Interpretation and Translation, Seoul, Korea, as the interpreter for the deposition, which the Plaintiff understands is an individual named Young Ha Lee. Defendant has proposed to have Ms. Cathy Y.H. Park (also from the Center for Interpretation and Translation) serve as the interpreter for the deposition, pursuant to the June 16, 2005 Order which provides that Defendant shall make the logistical arrangements for the deposition. In order to mitigate the parties' disagreement at this point so as not to impede the progress of the deposition, the parties stipulate that Lee will serve as the interpreter and Park will serve as the check interpreter, unless otherwise agreed to by the parties at the time of the deposition. However, it is Defendant's position that it should not be held responsible for payment of the services of Lee. Plaintiff reserves his right to contest Defendant's position.

**SO STIPULATED.**

**MATTHEW T. GREGORY, ESQ.**  
**LUJAN UNPINGCO AGUIGUI & PEREZ LLP**

By:   
**IGNACIO C. AGUIGUI, ESQ.**  
Attorneys for World Corporation

Date: 9/2/05

**COLIN M. THOMPSON**  
**ROBERT T. TORRES**


By:   
**COLIN M. THOMPSON, ESQ.**  
Attorneys for Plaintiff Yu Suk Chung

Dated: 9/2/05

**ORDER**

SO ORDERED this

September 6, 2005

  
**HON. ALEX R. MUNSON**  
District Judge

**RECEIVED**

SEP 27 2005

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District Court

U.S. Northern District